Michael F. Del Casino
Government Affairs Director

Suite 1000
1120 20th Street, NW
Washington DC 20036
202-457-2023
FAX 281-664-9801

November 17, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

> **Re: CG Docket No. 02-386; Rules and Regulations Implementing Minimum Customer Account Record Exchange Obligations on all Local and Interexchange Carriers**

Dear Ms. Dortch:

This Ex Parte provides a further supplement to the proposal by the Coalition of Interexchange Carriers and Local Exchange Carriers that was reviewed with representatives of the Consumer and Governmental Affairs Bureau on November 4, 2004 and further modified on November 8th.

Specifically, this Ex Parte provides statements of why certain data elements are required for each business activity, statements of specific data element information that should be provided when "reasonably available" and examples of appropriate CARE codes (TCSI's) to communicate each specific business activity. The attachment provides this additional material that the Coalition believes would be helpful in clarifying and/or supplementing its proposal.

This Notice is being filed pursuant to Section 1.1206(b)(2) of the Commission's rules. If you have any questions regarding this filing please do not hesitate to contact me.

Sincerely,

Attachment

cc: J. Keithley
       G. Fullano
       R. Smith
       L. Boehley
       E. McMahon

Mandated Business Activities Information Exchange

1) Overarching statements as to why the required data elements MUST be provided for each specific business activity:

The industry, through years of cooperative LSP and IXC experience, has identified specific data elements that are <u>absolutely critical</u> to support an efficient information exchange (CARE) process. The exchange of these data elements is vital to ensuring that our mutual customers receive prompt execution of account maintenance. The identified data elements are required according to the industry CARE/Industry Support Interface (ISI) document based on the business activity communicated. The required data elements are **customer-specific** and provide **all** carriers the minimum set of information necessary to accurately perform the requested business activity (*e.g.*, installation, update, transfer, cancellation, and billing) for the correct customer.

2) There are additional exceptions to be considered for data elements to be provided when the information is reasonably available:

   a) The customer's **BNA** should be provided for any activity where the BNA is not already identified as a required data element for the Business Activity.

   b) The Jurisdictional Indicator **(JI)** should be provided for all activities that involve the communication of information that impacts or identifies any PIC service (*e.g.*, InterLATA, IntraLATA) where the JI is not already identified as a required data element for the Business Activity.

   c) When the exchange of information involves a reject or notification of resale/UNE-P or number portability activity, it is expected that the identification **(LSP-ID)** of the new LSP for the resale/UNE-P or number port service will be provided when known.

3) We have added examples of some appropriate TCSIs that may be used for each of the identified business activities below.

Mandated Business Activities Information Exchange

The information in Column 2 (either the narrative or appropriate CARE TCSI Code) and all the data elements identified in Column 3 are the required pieces of information. These required pieces of information must be provided on each specific customer information exchange for the specific business activity identified in Column 1 as defined by the industry in the CARE/ISI document. Column 4 identifies certain conditions where additional pieces of specific data may be required, or should be provided when reasonably available, based on the business event.

Business Activity and Description	Business Event Narrative or Appropriate Four-Digit CARE TCSI[1]	Required Data Elements	Exceptions to Required Data Elements and/or Process Exceptions
1. Presubscription Orders Submitted by IXC When a customer contacts an IXC to establish the IXC as the preferred presubscribed toll carrier, the IXC must submit the customer's properly verified order to the customer's LSP instructing the LSP to install/change the PIC for the end user line(s) to the submitting IXC.	• WTN Presubscription Order or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 0101, 0105) • BTN Presubsciption Order or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 0104)	• For WTN Orders: WTN, Date, JI, CIC (submitting IXC) • For BTN Orders: BTN, Date, JI, CIC (submitting IXC)	
2. Presubscription Order Rejects When an IXC submitted PIC Order cannot be processed by the receiving LSP (either due to an order error or a specific customer service *e.g.*, PIC Freeze), it is the responsibility of the LSP to notify the submitting IXC with the specific reason why the order could not be processed.	LSP Reject to IXC Order with a specific reason why the order could not be processed or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 21XX, 31XX or 41XX)	All data elements provided on a reject must be the exact data elements submitted by the IXC on the original order. This is called the mirror-back rule.	• Rejects to BTN level PIC orders should be returned at the line level (WTN or Terminal) for each line under the submitted BTN, or use an applicable BTN level reject when the entire order including all WTNs/Terminals under the BTN cannot be processed. • On all rejects the JI should indicate the level of PIC

---

[1] Each business event can be communicated using the CARE process (*i.e.*, Transaction Code Status Indicators (TCSIs) with the required data elements) or if the TCSIs are not used, a full written description of the specific business event is required along with the required data elements.

Business Activity and Description	Business Event Narrative or Appropriate Four-Digit CARE TCSI[2]	Required Data Elements	Exceptions to Required Data Elements and/or Process Exceptions
			jurisdiction being rejected. ▪ Rejects due to number portability, resale or UNE-P arrangements, where the WTN is the responsibility of another LSP, the LSP ID of the new LSP for the end user should be provided when available.
3. Confirmation of IXC Submitted Presubscription Order Install When an LSP has processed the IXC submitted order, the LSP sends a confirmation to the submitting IXC as verification that the customer has been put on the IXC's network in the local switch	IXC Order Confirmation or Use the Appropriate 4-digit CARE TCSI code (e.g., TCSI 2004 or Toll Reseller Order TCSI 2020)	BTN, WTN, BNA, Date, CTI, Non-Pub/Non-List Indicator, JI, CIC	• Confirmations to a BTN level PIC order should be returned at the line level (WTN or Terminal) for each PIC confirmed line under the submitted BTN. • When a PIC Order Confirmation is a response to a toll reseller order submitted by the underlying IXC, the toll reseller indicator should be provided when available.
4. LSP Presubscription Order Install from LSP Business Office Order When a customer contacts the LSP business office and selects an IXC for presubscribed toll service(s), the LSP completes the order and notifies the selected IXC of the PIC install.	LSP Business Office Order Install Notification to the presubscribed IXC or Use the Appropriate 4-digit CARE TCSI code (e.g., TCSI 2003, 2008, 2009, 2010)	BTN, WTN, BNA, Date, CTI, Non-Pub/Non-List Indicator, JI, CIC, Restricted PIC Indicator	
5. LSP Presubscription Notification to the Authorized Carrier as a Result of a Customer Initiated PIC Dispute (alleged slam) When a customer reports a PIC	LSP Change in PIC Due to Customer Reported PIC Dispute (alleged slam) or	BTN, WTN, BNA, Date, CTI, Non-Pub/Non-List Indicator, JI, CIC, Restricted PIC Indicator Additionally, one or more of the following data elements must be	

---

[2] Each business event can be communicated using the CARE process (i.e., Transaction Code Status Indicators (TCSIs) with the required data elements) or if the TCSIs are not used, a full written description of the specific business event is required along with the required data elements.

Business Activity and Description	Business Event Narrative or Appropriate Four-Digit CARE TCSI[3]	Required Data Elements	Exceptions to Required Data Elements and/or Process Exceptions
Dispute to the LSP and requests to be returned to his previous presubscribed carrier (as the authorized carrier), the LSP processes the PIC change and notifies the authorized carrier of the PIC install as a result of the PIC Dispute. The PIC notification to the authorized carrier includes the identification of the alleged unauthorized carrier.	Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2011)	provided to identify the unauthorized carrier on this record for the disputed JI: 1. Disputed CIC 2. Disputed CIC-2 3. Disputed Company Code – Intralata	
6.LSP Presubscription Cancellation Notification to the Unauthorized Carrier as a Result of Customer-Initiated PIC Dispute (alleged slam) When a customer reports a PIC Dispute to the LSP, the LSP processes the PIC change and notifies the unauthorized carrier of the PIC cancellation as a result of the PIC dispute. The PIC notification to the alleged unauthorized carrier includes the identification of the authorized carrier.	LSP Notification of PIC Cancellation due to Customer Reported PIC Dispute (alleged slam) or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, **TCSI 2219 or 2217, 2218**)	BTN, WTN, Date, CTI, JI, CIC Additionally, one or more of the following data elements must be provided to identify the authorized carrier on this record for the disputed JI: 1. Disputed CIC 2. Disputed CIC-2 3. Disputed Company Code – IntraLATA	• BNA should be provided when available.
7. Presubscription Service(s) Cancelled from LSP Business Office Order When a customer contacts the LSP business office and selects a new IXC for presubscribed toll service(s), the LSP completes the order and notifies the old IXC of the PIC cancellation.	End User Cancelled IXC Service (s) through contact with LSP or Use the Appropriate 4-digit CARE TCSI code (*e.g.* TCSI 2203, 2209)	BTN, WTN, Date, CTI, JI, CIC	• BNA should be provided when available.
8. Presubscription Service(s) Cancelled from another IXC Order Submitted to the LSP When an LSP has processed an IXC submitted order, the LSP sends the old IXC a presubscribed service(s) cancellation notice.	End User Cancelled IXC service through another IXC order or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2206)	BTN, WTN, Date, CTI, JI, CIC	• BNA should be provided when available.
9. Local Service Disconnect (Dial-tone) Notification – Unspecified Reason	LSP Notification of Local Service (Dial-tone) Disconnect	BTN, WTN, Date, CTI, JI, CIC	• BNA should be provided when available.

[3] Each business event can be communicated using the CARE process (*i.e.*, Transaction Code Status Indicators (TCSIs) with the required data elements) or if the TCSIs are not used, a full written description of the specific business event is required along with the required data elements.

Business Activity and Description	Business Event Narrative or Appropriate Four-Digit CARE TCSI[4]	Required Data Elements	Exceptions to Required Data Elements and/or Process Exceptions
When a customer requests disconnection of local service, the LSP notifies the presubscribed IXC of the local service disconnect.	or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2201, 2215, 2216)		• This business event should not be used for PIC changes • This business event should not be used to communicate a partial or entire account number portability, local resale, or UNE-P migration when the specific number portability, resale or UNE-P activity can be identified and provided. (see 10 & 11 below)
10. Service Disconnected – Number Portability When the LSP can identify the customer is porting an existing number to a new provider, the LSP must notify the presubscribed IXC the customer is porting a TN to a new provider. *Note:* PIC may or may not be changing When the LSP cannot identify the customer is porting to a new provider, the LSP will notify the existing IXC of a service disconnect (see 9 above).	Service Disconnected Due to Number Portability or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, 2231 if number portability identified) or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, 2201, 2215 or 2216 when number portability is not identified)	BTN, WTN, Date, BNA, CTI, JI, CIC	• The LSP ID of the new carrier should be provided when available. • When the LSP knows a number is porting from a wire-line to a wireless carrier, a "W," should be provided in the Number Portability Indicator data element when available.
11. LSP Notification of Migration to New LSP – Local Resale or Termination of Local Resale Arrangement When a customer migrates to a new LSP (local resale or UNE-P), or when a local resale arrangement is terminated as a result of a line loss notification from the Switch	LSP Notification of Local Resale/UNE-P Migration or Termination or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, Transfer TCSI 2233; Termination of resale arrangement TCSI 2234)	BTN, WTN, Date, BNA, CTI, JI, CIC	• The LSP ID of the new carrier should be provided when available.

[4] Each business event can be communicated using the CARE process (*i.e.*, Transaction Code Status Indicators (TCSIs) with the required data elements) or if the TCSIs are not used, a full written description of the specific business event is required along with the required data elements.

Business Activity and Description	Business Event Narrative or Appropriate Four-Digit CARE TCSI[5]	Required Data Elements	Exceptions to Required Data Elements and/or Process Exceptions
Provider, the LSP must notify the presubscribed IXC of the migration or termination.

Note: PIC may or may not be changing.

When the LSP cannot identify the customer is migrating the local service to a new resale LSP, <u>or</u> cannot identify the termination of the local resale arrangement, the LSP will notify the existing IXC of a service disconnect (see 9 above). | or

Use the Appropriate 4-digit CARE TCSI code (*e.g.*, 2201, 2215 or 2216 when the Transfer or Termination of resale arrangement cannot be identified) | | |
| **12. Presubscribed End User Information Changes**

When, according to the LSP's records, any account or line information changes occur on a presubscribed end user's account, the LSP must communicate the changed information to the presubscribed IXC.

Notification from the LSP to the IXC is required whenever the specific types of information listed as required in column 3 are changed. Any other changed information not specifically listed should be provided when the change information is available.

Note: This business activity must not include change of PIC. | Presubscribed End User Information Changes

or

Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2317 or 2368, 2369; or any other applicable TCSI 23XX) | BTN, WTN, Date, CTI, Non-Pub/Non-List Indicator, BNA, CIC

<u>Required</u> When any of the following types of information change, the LSP must notify the IXC:
• BTN*
• WTN*
• Customer Code*
• CTI*
• Bill Name
• Bill Address
• Published Status

* *Whenever* the BTN, WTN, Customer Code, or CTI is changing the IXC must receive both the old and new information for each of the data elements that changed. | • JI should be provided when available.
• Data Element Change Indicator should be provided when applicable. |
| **13. IXC BNA Request for ANI**

When an IXC receives usage for an ANI where the IXC has no customer BNA, the IXC submits a request for BNA to the LSP. | IXC BNA Request for Submitted ANI or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 0501) | WTN (ANI), Date, CIC (submitting IXC) | |
| **14. Request for BNA Rejected**

When an IXC request for BNA for ANI cannot be provided by the LSP, it is the responsibility of the LSP to | LSP Reject for BNA Request with a specific reason why the BNA request could not be provided. | All data elements provided on a reject must be the exact data elements submitted by the IXC on the original BNA request. This is called the mirror-back rule. | • When the reject is due to a resold, UNE-P, or ported number arrangement, the |

---

[5] Each business event can be communicated using the CARE process (*i.e.*, Transaction Code Status Indicators (TCSIs) with the required data elements) or if the TCSIs are not used, a full written description of the specific business event is required along with the required data elements.

Business Activity and Description	Business Event Narrative or Appropriate Four-Digit CARE TCSI[6]	Required Data Elements	Exceptions to Required Data Elements and/or Process Exceptions
notify the requesting IXC with a specific reason why the BNA could not be provided.	or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 26XX)		LSP ID should be provided when available.
15. BNA Response When the LSP has processed the BNA for ANI, the LSP sends the BNA for the submitted ANI to the requesting IXC.	BNA Response for Submitted ANI or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2501)	WTN (ANI), Date, CIC (submitting IXC), Non-Pub/Non-List Indicator, BNA	
16. Subscription Order Installation As a Result of a Customer Move Within the LSP's Designated Area When the LSP can identify the customer is moving from one location to another within the LSP's designated area, where there is no change in the LSP, and may or may not involve a PIC change, the LSP must notify the presubscribed IXC of the install from the move activity. When the LSP cannot identify the customer is moving within the LSP's designated area, the LSP will notify the presubscribed IXC of the install using the install from an LSP business office order (see 4 above).	LSP Notification of a Customer Install From a Move or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2005 when the move can be identified or applicable TCSI 23XX) or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2003, 2008 or 2009 when a move cannot be identified)	BTN, WTN, BNA, Date, CTI, Non-Pub/Non-List Indicator, JI, CIC, Restricted PIC Indicator Note: *Whenever* the move includes a change in BTN, WTN, or Customer Code, the IXC must receive both the old and new information for each of these data elements.	• When there is no change in PIC for an install as a result of a move business event, an End User Information Change activity could be used to communicate this business event (see 12 above).
17. Presubscription Order Install As a Result of a Customer Change of Responsible Party When the LSP can identify the responsible party for the account has changed, which may or may not involve a PIC change, the LSP must notify the presubscribed IXC of the install from the change of responsible party activity.	LSP Notification of a Customer Install from a Change of Responsible Party or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2007 when the change of responsible party can be identified ;	BTN, WTN, BNA, Date, CTI, Non-Pub/Non-List Indicator, JI, CIC Note: *Whenever* the responsible party change includes a change in Customer Code, the IXC must receive both the old and new customer codes.	• When there is no change in PIC for an install as a result of a change of responsible party business event, an End User Information Change activity could be used to communicate this business event (see 12 above).

[6] Each business event can be communicated using the CARE process (*i.e.*, Transaction Code Status Indicators (TCSIs) with the required data elements) or if the TCSIs are not used, a full written description of the specific business event is required along with the required data elements.

Business Activity and Description	Business Event Narrative or Appropriate Four-Digit CARE TCSI[7]	Required Data Elements	Exceptions to Required Data Elements and/or Process Exceptions
When the LSP cannot identify the change of responsible party activity, the LSP will notify the presubscribed IXC of the install using the install from an LSP business office order (see 4 above).	or applicable TCSI 23XX) or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2003, 2008 or 2009 when the change of responsible party cannot be identified)		
18. Presubscription Service Canceled As a Result of a Customer Move Within the LSP's Designated Area When the LSP can identify the customer is moving from one location to another within the LSP's designated area where there is no change in the LSP, and may or may not involve a PIC change, the LSP must notify the presubscribed IXC of the IXC service cancellation due to the move activity. When the LSP cannot identify the customer is moving within the LSP's designated area, the LSP will notify the presubscribed IXC of the customer's service cancel using the Local Service Disconnect activity (see 9 above).	LSP Notification of IXC Service Canceled Due To Move Within the LEC Designated Area or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2202 when the move can be identified; or applicable TCSI 23XX) or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2201, 2215 or 2216 when the move cannot be identified)	WTN, Date, CTI, JI, CIC	• BNA should be provided when available. • When there is no change in PIC for a cancellation as a result of a move business event, an End User Information Change activity could be used to communicate this business event (see 12 above).
19. Presubscription Service Canceled As a Result of a Customer Change of Responsible Party When the LSP can identify the responsible party for the account has changed, which may or may not involve a PIC change, the LSP must notify the presubscribed IXC of the service cancellation from the change of responsible party activity.	LSP Notification of IXC Service Canceled Due to Customer – Responsible Party Change – Final Bill or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2212 when the change of responsible party can be identified;	BTN, WTN, Date, CTI, BNA, JI, CIC	• When there is no change in PIC for a cancellation as a result of a change of responsible party, an End User Information Change activity could be used to communicate this business event (see 12 above).

[7] Each business event can be communicated using the CARE process (*i.e.*, Transaction Code Status Indicators (TCSIs) with the required data elements) or if the TCSIs are not used, a full written description of the specific business event is required along with the required data elements.

Business Activity and Description	Business Event Narrative or Appropriate Four-Digit CARE TCSI[8]	Required Data Elements	Exceptions to Required Data Elements and/or Process Exceptions
When the LSP cannot identify the change of responsible party activity, the LSP will notify the presubscribed IXC of the customer's service cancellation using the Local Service Disconnect activity (see 9 above).	or applicable TCSI 23XX) or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2201, 2215 or 2216 when the change of responsible party cannot be identified)		
20. Advisory – Temporary Suspension of Service – non-payment When the LSP temporarily suspends a customer's local service due to non-payment, the presubscribed IXC should be notified of the service suspension. Some LSPs do not have the capability to perform this business activity or communicate this type of information; however, it is highly recommended that when the capability exists, that this information exchange takes place.	LSP Temporary Suspend of Local Service for Nonpayment or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2710 or 2722)	BTN, WTN, Date, CTI, Non-Pub/Non-List Indicator, JI, CIC	• BNA should be provided when available.
21. Advisory – Service Restored from Temporary Suspension – non-payment When the LSP restores the customer's local service from a temporary suspension due to non-payment, the presubscribed IXC should be notified of the suspension removal. Some LSPs do not have the capability to perform this business activity or communicate this type of information; however, it is highly recommended that when the capability exists, that this information exchange takes place.	LSP Temporary Suspension Restored or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2711 or 2723)	BTN, WTN, Date, CTI, Non-Pub/List Indicator, JI, CIC	• BNA should be provided when available.

[8] Each business event can be communicated using the CARE process (*i.e.*, Transaction Code Status Indicators (TCSIs) with the required data elements) or if the TCSIs are not used, a full written description of the specific business event is required along with the required data elements.

Business Activity and Description	Business Event Narrative or Appropriate Four-Digit CARE TCSI[9]	Required Data Elements	Exceptions to Required Data Elements and/or Process Exceptions
22. Advisory – Access to IXC Network Blocked When the LSP blocks a customer's access to the presubscribed IXC's network for nonpayment or a reason other than nonpayment, the LSP should notify the presubscribed IXC of the block activity. Note: Currently, there are several states where the LSP is restricted from informing the presubscribed IXC about customer payment delinquencies. It is essential for the presubscribed IXC to know when the LSP has blocked the customer from accessing the presubscribed IXC's network. Some LSPs do not have the capability to perform this business activity or communicate this type of information; however, it is highly recommended that when the capability exists, that this information exchange takes place.	LSP Notification of IXC Network Block or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2716, 2720, 2721)	BTN, WTN, Date, CTI, Non-Pub/List Indicator, JI, CIC, Toll Block Indicator	• BNA should be provided when available.
23. Advisory – Access to IXC Network Restored When the LSP removes the block on the customer's access to the presubscribed IXC's network, the LSP should notify the presubscribed IXC of the block removal. Some LSPs do not have the capability to perform this business activity or communicate this type of information; however, it is highly recommended that when the capability exists, that this information exchange takes place.	LSP Notification to IXC Network Access Restored or Use the Appropriate 4-digit CARE TCSI code (*e.g.*, TCSI 2717)	BTN, WTN, Date, CTI, Non-Pub/Non-List Indicator, JI, CIC	• BNA should be provided when available.

[9] Each business event can be communicated using the CARE process (*i.e.*, Transaction Code Status Indicators (TCSIs) with the required data elements) or if the TCSIs are not used, a full written description of the specific business event is required along with the required data elements.

GLOSSARY OF ACRONYMS	
Acronym	**Definition**
ANI	Automatic Number Identification
BNA	Billing Name and Address
BTN	Billing Telephone Number
CARE	Customer Account Record Exchange
CIC	Carrier Identification Code
CLEC	Competitive Local Exchange Company (Local Service Provider)
CTI	Customer Type Indicator (*i.e.*, Business or Residence)
ISI	Industry Support Interface (CARE/ISI)
IXC	Interexchange Carrier (a.k.a. Access Customer)
JI	Jurisdictional Indicator (IntraLATA and/or InterLATA and/or International)
LSP	All wire-line Local Service Providers (*i.e.*, ILEC, ICO, CLEC)
LSP-ID	Local Service Provider - Identification
PIC	Primary Interexchange Carrier
Non-Pub/Non-List	Not Published in a Directory and not available from Directory Assistance/Not Listed in Directory but may be obtained from Directory Assistance
SI	Status Indicator
TC	Transaction Code
TCSI	Transaction Code Status Indicator
UNE-P	Unbundled Network Element Platform
WTN	Working Telephone Number